

# EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

SAMSUNG ELECTRONICS CO., LTD and  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

*Defendants.*

Case No. 2:23-cv-00641-JRG-RSP

**JURY TRIAL DEMANDED**

**PLAINTIFF HEADWATER RESEARCH LLC'S AMENDED OBJECTIONS AND  
RESPONSES TO DEFENDANTS' FIRST SET OF REQUESTS FOR ADMISSION (NOS.  
1-40)**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Headwater Research LLC ("Headwater") provides amended responses to Defendants Samsung Electronics Co., Ltd. ("SEC") and Samsung Electronics America, Inc.'s ("SEA") (collectively, "Samsung") Requests for Admission (the "Requests") as follows:

Headwater's search for information is ongoing. Headwater reserves the right to rely on facts, documents, or other evidence that may develop or come to Headwater's attention at a later time. Headwater's responses are based on information presently known to Headwater and are set forth without prejudice to Headwater's right to assert additional objections and/or supplementary responses should Headwater discover additional documents, information or grounds for objections. Headwater reserves the right to supplement or amend its responses to the Requests at any time prior to the trial in this action.

[REDACTED]

**REQUEST FOR ADMISSION NO. 9:**

Admit that Headwater has never licensed the Asserted Patents to anyone other than ItsOn.

**RESPONSE TO REQUEST NO. 9**

In addition to Headwater's General Objections, which are incorporated by reference as though fully set forth herein, Headwater additionally objects to this Request to the extent it implies Headwater never offered, or attempted to offer a license to the Asserted Patents to anyone other than ItsOn.

Subject to and without waiving the foregoing General and Specific Objections, and to the extent that it understands this Request, Headwater responds as follows:

Admit.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Dated: March 28, 2025

Respectfully submitted,

/s/ Jason Wietholter

Marc Fenster

CA State Bar No. 181067

Email: mfenster@raklaw.com

Reza Mirzaie

CA State Bar No. 246953

Email: rmirzaie@raklaw.com

Brian Ledahl

CA State Bar No. 186579

Email: bledahl@raklaw.com

Ben Wang

CA State Bar No. 228712

Email: bwang@raklaw.com

Adam Hoffman

CA State Bar No. 218740

Email: ahoffman@raklaw.com

Paul Kroeger

CA State Bar No. 229074

Email: pkroeger@raklaw.com

Neil A. Rubin

CA State Bar No. 250761

Email: nrubin@raklaw.com

Kristopher Davis

CA State Bar No. 329627

Email: kdavis@raklaw.com

James S. Tsuei

CA State Bar No. 285530

Email: jtsuei@raklaw.com

James A. Milkey

CA State Bar No. 281283

Email: jmilkey@raklaw.com

Philip Wang

CA State Bar No. 262239

Email: pwang@raklaw.com

Jason M. Wietholter

CA State Bar No. 337139

Email: jwietholter@raklaw.com

Qi (Peter) Tong

TX State Bar No. 24119042

Email: ptong@raklaw.com

**RUSS AUGUST & KABAT**

12424 Wilshire Blvd., 12th Floor

Los Angeles, CA 90025  
Telephone: 310-826-7474

Andrea L. Fair  
**MILLER FAIR HENRY PLLC**  
1507 Bill Owens Parkway  
Longview, Texas 75604  
Telephone: 903-757-6400  
andrea@millerfairhenry.com

**ATTORNEYS FOR PLAINTIFF,**  
**Headwater Research LLC**

**CERTIFICATE OF SERVICE**

The undersigned certifies that on March 28, 2025 all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via electronic mail.

/s/ Jason Wietholter  
Jason Wietholter